

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

| | | |
|----------------|---|-------------------------|
| IN RE: | : | |
| BRETT D. MCKAY | : | CASE NO. 1-15-04437-HWV |
| Debtor | : | |
| | : | CHAPTER 13 |
| M&T BANK | : | |
| Movant | : | |
| | : | |
| v. | : | |
| | : | |
| BRETT D. MCKAY | : | |
| Respondent | : | |

**DEBTOR'S RESPONSE TO MOTION OF M&T BANK FOR
RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362**

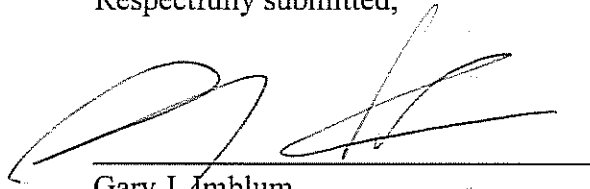
AND NOW, comes Debtor, Brett D. McKay, by and through his attorney, Gary J. Imblum,
and respectfully responds as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is demanded.
5. Admitted.
6. Admitted in part and denied in part. Debtor sent a payment on March 14, 2018 in the amount of \$955.00. Debtor offers to cure the remainder of the post-petition arrearage through an Amended Plan.
7. Admitted in part and denied in part. See response to paragraph 6.
8. Admitted.

9. Denied. All attorney's fees and costs relating to this Motion should be disclosed to the Court and approved in this proceeding and no attorney's fees and costs other than those approved in this proceeding should be charged in relation thereto.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtor

DATED: 3-15-18

CERTIFICATION OF SERVICE

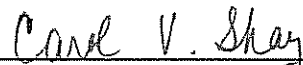
I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF M&T BANK FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362 upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

JAMES C. WARMBRODT, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

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DATED: 3/15/18